



**TRANSPORTATION
FEDERAL CREDIT UNION**

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March 8, 2010

Jennifer J Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Re: Regulation DD; Docket No. R-1315

Dear Ms. Johnson:

On behalf of Transportation Federal Credit Union, I am writing in response to your request for comment on the above-captioned proposed rule to amend Regulation DD. We are a moderate sized federal credit union primarily serving members in the Washington, DC area, with a proud tradition of fairness and transparency in the services we offer to our members.

We support the intent of the proposed rule, but we believe that a change to the proposed Section 230.11 (a) (1) and associated commentary could provide greater clarity on periodic statements than the use of the term "Total Overdraft Fees" for financial institutions that, like us, do not charge additional overdraft fees beyond a per-item charge for overdraft items paid. We do not charge "any additional fees for daily or sustained overdraft, negative balance or similar fees or charges."

We believe that the term "Total Paid Overdraft Fees" should be permitted as an alternative description for institutions that charge only a per-item fee for overdrafts. This term specifically differentiates these fees as assessed for items that have been paid, rather than returned unpaid, thus giving a clearer description and disclosure to the account holder, in keeping with the intent of Regulation DD and the proposed rule change.

In conclusion, we support the proposed rule and appreciate the opportunity to comment on it, but believe it would be improved by permitting the use of the term "Total Paid Overdraft Fees" as described above. Should you have any questions or require additional information, please call me at (202) 385-6065.

Sincerely,

Anthony E. "Rusty" Vellek
Compliance Officer



Your savings federally insured to at least \$250,000
and backed by the full faith and credit of the United States Government



Additional coverage up to \$250,000 provided by Excess
Share Insurance Corporation, a licensed insurance company.